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and Seymour

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ANDREW CLARK

Case No. 6:20-cv-00253-AA

Plaintiff,

vs.

WELLS FARGO BANK, OGLETREE
DEAKINS NASH SMOAK STEWART,
P.C., OREGON BAR ASSOCIATION,
LEAH C LIVELY, DAVID P.R. SYMES,
CHRISTOPHER MIXON, MICHAEL
HOGAN, ALEX GARDNER, ERIK
HASSELMAN, STEVEN SEYMOUR,
CHRISTIAN ROWLEY, BENJAMIN
GUTMAN, BARRY DAVIS, DAVID
CAMPBELL, BRUCE NEWTON,
PETER URIAS, ELLEN ROSEBLUM,
SABASTIAN NEWTON TAPIA, BEN
MILLER, and VANESSA NORDYKE

**DEFENDANTS' OGLETREE, DEAKINS,
NASH, SMOAK, STEWART, P.C., LEAH
LIVELY, DAVID P.R. SYMES,
CHRISTOPHER MIXON, AND STEVEN
SEYMOUR'S MOTION FOR
PROTECTIVE ORDER AND MOTION
TO DECLARE PLAINTIFF A
VEXATIOUS LITIGANT**

Pursuant to Fed. R. Civ. P. 26(c)

Request for Oral Argument

Defendants.

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel made a good faith effort to confer with Plaintiff *pro se* regarding the substance of this motion, including each claim, defense and issue raised herein, by email. Unfortunately, the parties were unable to resolve the issues.

MOTION

Defendants Ogletree, Deakins, Nash, Smoak, Stewart, P.C., Leah Lively, David P.R. Symes, Christopher Mixon, And Steven Seymour (“defendants”), by and through their counsel, John E. Pollino, hereby respectfully move this Court for a Protective Order pursuant to Fed. R. Civ. P. 26(c). Further, pursuant to 28 U.S.C. § 1651(a), the defendants request this Court enter an order declaring Plaintiff a vexatious litigant and prohibiting Plaintiff from filing future complaints.

This motion is supported by the Memorandum in Support of Defendants’ Motion for a Protective Order and Motion to Declare Plaintiff a Vexatious Litigant; the Declaration and Exhibits in Support of Defendants’ Motion to Dismiss, Motion for a Protective Order, and Motion to Declare Plaintiff a Vexatious Litigant; and the trial court file.

DATED this 9th day of April, 2020.

GARRETT HEMANN ROBERTSON P.C.

s/ John E Pollino

John E Pollino

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Of Attorneys for Defendants Ogletree, Deakins, Nash,
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Christopher Mixon, and David Symes

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **Defendant's Motion for a Protective Order and Motion to Declare Plaintiff a Vexatious Litigant** on the date indicated below,

☒ Via First-Class Mail with postage prepaid
☒ Via Electronic Filing
☐ Via Facsimile Transmission
☐ Via Hand Delivery
☐ Via Overnight Delivery

to the following person(s) a true copy thereof, contained in a sealed envelope (if other than by electronic filing notice), addressed to said person(s) at their last known addresses indicated below:

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DATED this 9th day of April, 2020.

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